

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

HANNAH C. DUGAN,

Case No. 25-CR-0089-LA

Defendant.

DEFENDANT’S MOTION FOR SUPPLEMENTAL JURY QUESTIONNAIRE

Hon. Hannah C. Dugan moves the Court for an order to issue a supplemental jury questionnaire to potential jurors with early disclosure of all responses to counsel. Although the parties agree that a supplemental questionnaire is necessary, they have been unable to agree on the specific questions. Judge Dugan therefore requests an in-person hearing as soon as practicable after the June 9, 2025, pretrial motion response deadline. Rule 24 of the Federal Rules of Criminal Procedure allows the Court to grant this motion. In support of this motion, Dugan states:

1. This case is scheduled for a jury trial on July 21, 2025. ECF 17.
2. The normal procedure for jury selection in the Eastern District of Wisconsin utilizes a limited questionnaire, the answers of which are made available to the parties shortly before trial. The Court then conducts more in-depth, in-person voir dire questioning immediately before trial.
3. Both Judge Dugan and the government believe a supplemental written jury questionnaire is appropriate in this case.

4. On May 27, 2025, and May 28, 2025, counsel for Judge Dugan and the government each exchanged drafts of specific proposed supplemental jury questions. But the parties have not been able to reach a complete agreement on the specific questions.

5. The Court has broad discretion in determining the nature and extent of the examination of potential jurors. *See* FED. R. CRIM. P. 24; *Mu'min v. Virginia*, 500 U.S. 415, 427 (1991). Given the nature of the charges in this case, the national media attention, and the possibility of needing to start with a larger panel of potential jurors, an expanded questionnaire will permit a more efficient jury selection process.

6. Specifically, an expanded questionnaire will provide the parties with necessary answers to more detailed questions related to any potential juror's possible predisposition or prejudgment, without taking up the jurors' or the court's time asking the same questions of each prospective juror while simultaneously affording potential jurors greater privacy.

7. Any supplemental juror questionnaire would need to be finalized well before the trial to allow time for the Clerk of Court to send out supplemental questionnaires and for potential jurors to fill out and return supplemental questionnaires. To preserve her right to a speedy trial, Judge Dugan requests an in-person hearing as soon as practicable after the June 9, 2025, pretrial motion response deadline.

8. Attached as Exhibit A to this motion is a copy of Judge Dugan's proposed supplemental juror questionnaire. This is not the original proposed questionnaire Judge Dugan sent to the government. This is a proposed compromise questionnaire, drafted in response to the government's proposed questionnaire.

9. Other than Defendant's Proposed Supplemental Juror Questionnaire, no brief or other supporting documents will be filed with this motion.

Dated at Madison, Wisconsin May 30, 2025.

Respectfully submitted,

HON. HANNAH C. DUGAN, *Defendant*

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